



Thank you for the opportunity to submit comments to the Commission on the implementation of the Future Energy Jobs Act (FEJA) retail customer distributed energy resource valuation and compensation.

Illinois PIRG Education Fund is an independent, non-partisan group that works for consumers and the public interest. Through research, public education and outreach, we serve as counterweights to the influence of powerful special interests that threaten our health, safety or well-being.

Rather than a detailed response to the Commission's questions, our comments present our broader interest in the topics being explored in this workshop. Our sister environmental organization, Environment Illinois Research & Policy Center, has joined a group comment which goes into more detail, which we support.

Distributed clean energy systems provide multiple benefits for individual consumers, consumers as a whole, and society. Studies in multiple states have demonstrated that rooftop solar and distributed clean energy systems, when the full value of the benefits they provide to the electric grid and to society are accounted for, often provide greater value than even the retail rate of electricity.

Considering the significant value these systems provide to the grid and society, compensation mechanisms should be designed not only to deliver fair compensation to retail customers, but also to encourage more Illinois residents to adopt distributed generation systems, further benefiting all consumers and society as a whole.

Distributed clean energy systems benefit the electric grid in many ways, including but not limited to:

- Avoided energy costs;
- Avoided capital and capacity investment;
- Reduced financial risks and electricity prices;
- Increased grid resiliency; and
- Avoided environmental compliance costs.

Distributed clean energy systems further provide valuable benefits for society, including:

- Avoided greenhouse gas emissions;
- Reduced air pollution that harms public health; and
- Local job creation.

A detailed accounting of these benefits will take time and will require increased data transparency so all stakeholders have access to the same information. This includes a regularly updated hosting capacity analysis, distributed energy resource growth projections, and a grid-needs assessment.

As this detailed accounting with equal access to data is performed, the commission should avoid signaling uncertainty about future values or make drastic changes in rebate values, so as not to discourage customer adoption of distributed clean energy systems.

Again, thank you for the opportunity to provide comment.